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Attorneys for Defendant Save On SP, LLC

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

JOHNSON & JOHNSON HEALTH CARE SYSTEMS INC.,

Plaintiff,

v.

SAVE ON SP, LLC,

Civil Action No. 22-2632 (ES)(CLW)

Document Electronically Filed

Return Date: October 16, 2023

NOTICE OF MOTION TO SEAL

Defendant.

PLEASE TAKE NOTICE on October 16, 2023, or a date and time to be set by the Court, Defendant Save On SP, LLC, by and through its attorneys Robinson & Cole, LLP and Selendy Gay Elsberg, PLLC, shall move for the entry of an order, pursuant to Local Civil Rules 5.3(c) and 7.1, permanently sealing portions of JJHCS's Letter dated June 26, 2023 [ECF No. 123], Exhibit 2 to the Letter in its entirety, and portions of the June 6, 2023 transcript [ECF 116].

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This Motion is timely under Local Civil Rule 5.2(c)(2), as it was filed within 14 days following the filing of the letter sought to be sealed. Pursuant to Local Civil Rule 7.1(d)(4), no legal brief is required because all relevant proposed findings of fact and conclusions of law required by Local Civil Rule 5.3(c)(3) have been set forth in the Declaration of E. Evans Wohlforth, Jr., Esq. submitted herewith.

PLEASE TAKE FURTHER NOTICE that, in support of the within motion, Defendant shall rely upon the Declaration of E. Evans Wohlforth, Jr., Esq., and upon the pleadings and all prior proceedings in the above-captioned action.

PLEASE TAKE FURTHER NOTICE that a copy of the proposed Findings of Fact and Conclusions of Law and Order Granting the Motion to Seal is submitted with this Notice.

PLEASE TAKE FURTHER NOTICE that a certificate attesting to the date and manner of service of these moving papers is submitted herewith.

Dated: September 22, 2023

By: <u>s/ E. Evans Wohlforth, Jr.</u>

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